



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

By ECF

The Honorable Jesse M. Furman
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

July 15, 2021

The Application is GRANTED. The United States is granted until **July 23, 2021**, to decide whether to intervene in this matter. Further extensions as unlikely to be granted. The Clerk of Court is directed to terminate ECF No. 48. SO ORDERED.

Re: Fuld v. Palestine Liberation Organization, 20 Civ. 3374 (JMF)

A handwritten signature in black ink, appearing to read "Audrey Strauss", is written over the signature line.

July 15, 2021

Dear Judge Furman:

This Office represents the United States (the “government”) in the above-named action. On May 6, 2021, the Court certified to the Department of Justice the defendants’ constitutional challenge to the Promoting Security and Justice for Victims of Terrorism Act of 2019. The Court has allowed the government until July 16, 2021—after the government’s first extension request, for ten days, was granted—to intervene in accordance with Fed. R. Civ. P. 5.1(c). The government now respectfully seeks an additional seven days, to July 23, 2021, to decide whether to intervene pursuant to Rule 5.1. This is the government’s second request for an extension of time; counsel for the parties consent to this request.

In deciding whether to intervene, the Acting Solicitor General seeks input from a number of components of the Department of Justice, including, in this case, the United States Attorney’s Office, the Federal Programs Branch, and the Civil Division Appellate Staff, as well as other interested federal agencies, here including the Department of State. The additional time now requested is needed for the government to complete the process of inter-agency consultation, for the Acting Solicitor General to reach a final decision, and, should the Acting Solicitor General authorize intervention, for the preparation of a memorandum for filing.

Thank you for your consideration.

Respectfully,

AUDREY STRAUSS
United States Attorney

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cc: counsel, by ECF